

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

DOCOMO Pacific (Saipan), Incorporated,
Applicant

For Authorization to Obtain Numbering
Resources Pursuant to Section 52.15(g) of
the Commission's Rules

WC Docket 17-_____

**APPLICATION OF DOCOMO PACIFIC (SAIPAN), INC.
FOR AUTHORIZATION TO OBTAIN NUMBERING RESOURCES**

DOCOMO Pacific (Saipan), Inc. ("DPAC-Saipan"), pursuant to Section 52.15(g)(3)(i) of the Commission's rules, respectfully requests authorization to obtain numbering resources directly from the North American Numbering Plan Administrator and Pool Administrator ("Numbering Administrators") as set forth in the Commission's *Numbering Order*.¹ Such authorization may be obtained upon an application to the Commission containing the information detailed in Sections 52.15(g)(3)(i)(A)-(F) of the Commission's rules.

In support of this application, DPAC-Saipan provides the following information required by the Commission's rules:

47 C.F.R. § 52.15(g)(3)(i)(A)

Name: DOCOMO Pacific (Saipan), Inc.

Address: 219 S. Marine Corps Drive, Ste. 206, Tamuning, Guam 96913

Telephone: (671) 688-2355

Qualified Personnel James W. Hofman, II, Chief Legal Officer

¹ *Numbering Policies for Modern Communications*, Report and Order, 30 FCC Rcd 6839 (2015).

For purposes of this application, inquiries pertaining to issues associated with 9-1-1, law enforcement, and general compliance with Commission rules can be directed to James W. Hofman, II, Chief Legal Officer.

47 C.F.R. § 52.15(g)(3)(i)(B)

DPAC-Saipan acknowledges that authorization to obtain numbering resources under Section 52.15(g) of the Commission's rules is subject to compliance with applicable Commission numbering rules as well as to the numbering authority delegated to the states. DPAC-Saipan also acknowledges that this authorization is subject to compliance with industry guidelines and practices regarding numbering as applicable to telecommunications carriers.

47 C.F.R. § 52.15(g)(3)(i)(C)

DPAC-Saipan acknowledges that it must file requests for numbers with the relevant state commission(s) at least thirty (30) days before requesting numbers from the Numbering Administrators. The jurisdiction in which DPAC-Saipan intends to seek numbering resources is the Commonwealth of the Northern Mariana Islands ("CNMI"), specifically the islands of Rota, Tinian, and Saipan.

47 C.F.R. § 52.15(g)(3)(i)(D)

DPAC-Saipan sets forth its capability to provide service within 60 days of the numbering resources activation date in accordance with 47 C.F.R. § 52.15(g)(2). DPAC-Saipan's capability to provide service within this 60-day period is based on: (1) its position as an established service provider in the CNMI; (2) its existing network that will be used to provide interconnected Voice over Internet Protocol ("VoIP") services; and (3) the established network operations and business processes of its affiliate that has been providing interconnected VoIP services in Guam for more than seven years. Each of these capabilities is discussed in greater detail below.

(1) Established service provider in the CNMI.

DPAC-Saipan, which is a CNMI corporation, is a wholly-owned subsidiary of DOCOMO PACIFIC, Inc. (“DPAC-Guam”), which, in turn, is owned by DOCOMO Guam Holdings, Inc. DPAC-Saipan provides facilities-based video programming as a cable television operator throughout the CNMI and is expanding its service portfolio to offer interconnected VoIP service to customers located on the islands of Rota, Tinian, and Saipan. DPAC-Saipan has existing ordering, provisioning, maintenance and repair, billing, and customer care systems that currently support its existing cable operations that can readily be expanded to support its interconnected VoIP service offering.

(2) Existing network facilities in place throughout the CNMI.

Throughout the CNMI, DPAC-Saipan currently has in place fiber-to-the-home, fiber-to-the-building, hybrid fiber-coax, and other facilities that are used to serve residential and business customers. DPAC-Saipan will use these same facilities to support its interconnected VoIP service offerings.

DPAC-Saipan is installing a new softswitch that will be used for interconnected VoIP traffic. This installation is expected to be complete in April 2017, and the softswitch should be operational within 14 calendar days of the code activation date. If DPAC-Saipan should encounter any issues that may impact the installation or operation of the new softswitch, DPAC-Saipan will be able to provide service within 60 days of the numbering resources activation date by utilizing an existing softswitch on Guam that currently supports interconnected VoIP services offered by its affiliate, DPAC-Guam.

(3) Established business operations in the region.

In offering interconnected VoIP services in the CNMI, DPAC-Saipan will be able to leverage the existing network operations and business processes of its affiliate, DPAC-Guam. An FCC licensee currently providing commercial mobile radio services and mobile broadband in the Guam-Northern Mariana Islands Major Trading Area, DPAC-Guam also has been offering interconnected VoIP services in Guam for more than seven years. DPAC-Saipan will rely upon DPAC-Guam in launching its interconnected VoIP services in the CNMI.

For example, DPAC-Guam has existing operation centers that will be used to support DPAC-Saipan's interconnected VoIP service offerings. Specifically, DPAC-Guam's switch operations center that oversees the company's mobile switching system and softswitch located in Guam will be responsible for DPAC-Saipan's softswitch once it is operational. Likewise, DPAC-Guam operates a call center that will be used to support DPAC-Saipan's interconnected VoIP customers in the CNMI.

Likewise, DPAC-Guam's points of presence ("POPs") in Guam and CNMI are connected over operational mid-span fiber meet points of interconnection ("POIs"). These POIs are currently utilized by DPAC-Guam to exchange traffic with the networks of the incumbent local exchange carriers in Guam and CNMI, respectively. DPAC-Saipan will utilize these same POIs and rely upon DPAC-Guam's established business relationships with other communications services providers with switch and/or transport facilities in Guam and CNMI to exchange traffic.

Finally, DPAC-Guam has systems and processes in place to put numbers into service expeditiously and to support number portability and mandatory number reporting requirements. DPAC-Saipan will utilize these same systems and procedures in offering interconnected VoIP service in the CNMI.

47 C.F.R. § 52.15(g)(3)(i)(E)

DPAC-Saipan certifies that it complies with its Universal Service Fund contribution obligations under 47 C.F.R. part 54, subpart H, its Telecommunications Relay Service contribution obligations under 47 C.F.R. § 64.604(c)(5)(iii), its NANP and LNP administration contribution obligations under 47 C.F.R. §§ 52.17 and 52.32, its obligations to pay regulatory fees under 47 C.F.R. § 1.1154, and its 911 obligations under 47 C.F.R. part 9.²

47 C.F.R. § 52.15(g)(3)(i)(F)

DPAC-Saipan hereby certifies that it has the financial, managerial, and technical expertise to provide reliable service. As an existing provider of cable service in the CNMI, DPAC-Saipan has the demonstrated expertise to serve its customers, regardless of the service to which they may subscribe.

Furthermore, all DPAC-Saipan personnel are hired and managed by DPAC-Guam. Thus, while DPAC-Saipan has personnel working in the CNMI, the leadership of the functions that require financial, managerial, and technical expertise are retained within DPAC-Guam, which has a proven track record of providing reliable interconnected VoIP service in Guam. During its time in business in the region, DPAC-Guam has not only been able to place numbers into service, but it has done so without any impairment, with calls routed and numbers ported successfully by DPAC-Guam. The same financial, management, and technical personnel will be responsible for ensuring that DPAC-Saipan provides reliable service in the CNMI.

DPAC-Saipan's key management and technical personnel are listed below, none of whom are being or have been investigated by the Commission or any law enforcement or

² Although DPAC-Saipan is not currently offering interconnected VoIP service, DPAC-Guam has an established history of compliance with each of the regulatory obligations set forth in 47 C.F.R. § 52.15(g)(3)(i)(F).

regulatory agency for failure to comply with any law, rule, or order:

Jonathan Kriegel	President & CEO
Masafumi Masuda	Chief Technology Officer
James W. Hofman, II	Chief Legal Officer
Willis Cannon	VP – Field Operations and Engineering
John Rhee	VP – Network Transport
Nathan Paul	VP – Information Technology

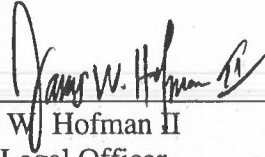
47 C.F.R. § 52.15(g)(3)(i)(G)

DPAC-Saipan hereby certifies that no party to this application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

47 C.F.R. § 52.15(g)(3)(iv)

As required by Section 52.15(g)(3)(iv), DPAC-Saipan acknowledges that it will maintain the accuracy of all contact information and certifications in this application, and will file a correction with the Commission and each applicable state within 30 days of any changes. DPAC-Saipan also will furnish accurate regulatory and numbering contact information to each state commission when requesting numbers in that state.

Pursuant to Section 52.15(g)(3)(i) of the Commission's rules, DPAC-Saipan respectfully requests the Commission grant this application for authorization to obtain numbering resources.



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March 7, 2017